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November 7, 2013

Via Electronic Submission

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions; Docket No. 12-268

Dear Ms. Dortch:

On November 4, 2013, Sennheiser Electronic Corporation filed a set of comments urging the Commission to require winning bidders of 600 MHz band spectrum that is to be reclaimed from broadcasters and re-auctioned for commercial purposes to reimburse wireless microphone users who will be forced to purchase new equipment to relocate their operations. Sennheiser has proposed a specific mechanism to implement this relocation obligation.

Audio –Technica U.S., Inc. ("A-T") A-T is a designer and manufacturer of high-performance headphones, microphones, mixers and electronic products for home and professional use and has been an active participant in the Commission's ongoing proceedings to allow unlicensed devices to operate within the television white spaces. A-T was one of a number of manufacturers that offered customer rebates on previously purchased 700 MHz wireless microphone products when the Commission required wireless microphone operations in the 700 MHz band to cease in 2010. Sennheiser correctly points out that many of these users will now be required to replace perfectly functioning equipment for the second time in less than five years following the reclamation and re-auction of the 600 MHz band spectrum. A-T agrees with Sennheiser that the Commission has the authority to require spectrum auction winning bidders to reimburse wireless microphone users who will be displaced from the band as a result of the auction and that basic fairness requires such reimbursement. Accordingly, A-T requests that the Commission issue a public notice requesting comment on the reimbursement mechanism proposed by Sennheiser in its November 4 comments in this proceeding and on related issues.

Sincerely

Jacquelynn A. Green
V.P. R&D /Engineering